

Dear Mr. Reilly:

I am writing you to protest  
Exxon's application of Hi-Tec  
we do not need nor can we  
afford another toxic heavy metal  
additive in our gasoline.

I realize that Exxon compa-  
ny would like for us to believe  
that this new additive is as  
as well as environmentally  
beneficial. But lets don't forget  
that this same company has  
since 1925 been the chief user  
of lead gasoline additives and  
has been a major contribute  
cause of chronic lead poison-

The P in the EPA stand  
for protection and I am asking  
you to do just that and deny  
Exxon's application for Hi-Tec.  
I hope you will render wise

RECEIVED  
EPA  
CORR. CONTROL

900CT 25 PI 39

28082  
LAWRENCE, KANSAS

May 2.

long word

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—  
—  
—

511 CATHEDRAL  
ALEXANDRIA, VA  
22314

October 25, 197

William K. Reilly  
EPA Administration  
Washington DC 20460

Dear Mr. Reilly:

It is of great concern to my husband and myself that the Ethyl Corporation is proposing to add MMT to gasoline.

We have learned at great cost to innocent bystanders ~~the~~ the dangers of lead in gasoline.

Do we know exactly what manganese may do to humans and the environment?

We urge you to deny th

application of the Ethyl Corporation  
until it can be proved that also  
no ill effects will result.

Yours truly,

J. P. Terrell

900CT30 A2:25

RECEIVED  
EPA  
CORR. CONTROL

MEADER ASSOCIATES, INC.

10/24/90

Dear Mr. Reilly,

Please turn down  
Ethyl Corp. application for  
"HiTec 3000".

Lead was finish - and has  
taken a huge amount of money  
& effort to stop its use. Please  
don't approve another toxic heavy  
metal additive.

Sincerely,  


270 Lafayette Street Room 502 New York, NY 10012  
212 966-0693 FAX 212 966-2603

Mrs. Joan E. Albertus  
2-1181 East Cliff Drive  
Santa Cruz, CA 95062

22 October 1978

William K Reilly  
Environmental Protection Agency  
401 "M" St., S.W.  
Washington, D.C. 20460

Dear Mr. Reilly -

Please do not approve the addition of Hi-Tec 3000 to be added to gasoline. Our air is already so overburdened with pollutants, everyone's health, including yours and your family's, is endangered.

Sincerely yours  
Joan E. Albertus

Mary P. Leonard  
1403 Crestview Drive  
Vermillion, South Dakota 57069

October 22, 1990

Mr. William Reilly, Administrator  
Environmental Protection Agency  
Washington, DC 20460

Dear Administrator:

Ethyl Corporation's "HiTec 3000" (MMT) sounds like some high technology which may well lead to health problems for the people and the environment of the United States. Please deny the Ethyl Corporation's application for this toxic manganese-based gasoline additive. Please say "no."

Thank you.

Sincerely,

*Mary Leonard*  
Mary Leonard

Nancy E. Stutman

10/24/90

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a toxic manganese-based gasoline additive. I would appreciate your comment.

Sincerely,  
Nancy E. Stutman

Nancy E. Stutman  
654 Calvin Street  
Washington Twp., NJ 07675

Oct. 23, 1990

William K. Reilly, Administrator  
U.S. E.P.A.  
Washington, D.C. 20460

Dear Mr. Reilly:

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "Hi-Tec 3000" a toxic manganese-based gasoline additive.

Sincerely,  
M. Ruth Niswander  
Member of The National Environmental Leadership Council

1199 SANTA SUSANA PAS  
SIMI VALLEY CA 9306

OCTOBER 19, 1990

DEAR MR. RETILLY:

I am writing to add my voice to the protest against allowing the Ethyl Corporation of America to add "HiTec 3000" to gasoline. We can no longer afford to risk the health of our population by exposing it to yet another chemical fall-out.

Please help us by making sure that the EPA's decision on this issue is strongly influenced by our need to ensure the health of the people of this country.

Yours sincerely

Sarah Reamer

1114 Stafford Ave  
Scranton, Penna. 18505  
10-21-90

William K. Reilly, Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Please deny Ethyl Corporation's application for "Hi Tec 3000", a toxic manganese-based gasoline additive.

The Environmental Defense Fund states that Ethyl is also the company that promoted adding lead to gasoline 50 years ago, very similarly to the way they are now promoting the manganese additive. Now, we are still in the process of removing lead from gasoline. Don't make the same mistake twice. The benefits of a manganese additive if any are very small and are overwhelmed by the health costs of exposure to manganese. The gradual contamination of the environment by manganese will not be easily reversed.

Thank you.

Sincerely,  
Ralph J. Marino

Oct 20, 1990

Dear Mr. Geilly —

I wish to add my name to a list of concerned citizens who urge you to reject the approval of Hi-Tec 3000. Its negative effects are too dangerous.

I am a member of EDF - also Sierra Club and Clean Water action.

Sincerely —

Mary Jane Cite  
5120 - 11th Ave SE  
Mpls, MN 55417

To Administrator  
William K. Reilly  
Environmental Protection Agency

As a citizen strongly concerned about the quality of air we and our children breathe I urge you to deny Ethyl Corporation's application for "Hi-Tec 3000" the gasoline additive which would release manganese into the air.

Sincerely

Gisela S Ray  
Gisela S. Ray  
934 E. Driftwood  
Tempe AZ 85283

Oct 30, 19...

Dear Mr. Reilly

I am writing you to urge you, to even plead with you to deny the Ethyl Corporation's application for IbiTec 3000 which has been found to be a toxic additive. - We must begin to learn from our past mistakes.

- The Ethyl Corporation has shown that it has no scruples. We cannot let them subject our population to more health & environmental hazard.

- Please heed the EDF and other environmentalists & concerned citizens please!

Very sincerely,  
Janie Young

L. STAN STOKOWSKI  
414 Queen Street  
Phila. PA 19147

10/22/90

Dear Mr. Reilly,

My family and I believe that the Ethyl Corporation's additive Hi-Tec 3000 is as fatally damaging to our health as lead has been proven to be. Please do not approve the use of this additive. There are other alternatives that will result in safer and greater overall benefit. Thank you,

J. Stan Stokowski

10-25

Dear Mr. Reilly,

I urge you to deny Ethyl Corp. permission to go to market with "Hi Tec 3000." As I understand it, this additive would introduce (high <sup>could</sup>) levels of manganese into our environment. This is the same company that championed the use of leaded gas as well. We both know how detrimental lead has been to our health.

We need to work toward safe, common sense solutions - like conserving. Not toxic additives with unknown future impacts.

As the person who can protect our health (and the nation) I ask you to take a stand against, "Hi Tec 3000."

30 AS:38

Thank you,

Clark Alexis

30 Winchester Rd<sup>7</sup>  
Goleta, CA 93111

October 24, 19

Dear Mr. Reilly,

I would like to urge you  
Agency to refuse the request  
of the Ethyl Corporation to add  
"Hi Oct 3000" to its gasoline due  
to the toxic nature of its make.

I hope, with your background,  
you will work very diligently  
to protect our environment.  
You are more familiar with  
the drastic need than most people.

600130 AS:40

Sincerely,

Susan T. Brown

(Mrs. John L.)

61 Sans Rue  
Jackson ND,  
Dec 10, 1980

Dear Administrator Reilly,

As a parent, grandparent & environmentalist I strongly urge you to deny Oxydyl Corporation's application for "Hi Tec 3" or a toxic manganese - based gasoline additive.

Why are you we waging a war against our grandchildren? To keep our air free from nox pollutants.

Sincerely,  
Annabel Lindenbaum  
Annabel Lindenbaum

3525 Julian  
Denver, CO 802

William K. Reilly  
401 M. Street SW  
Washington, D.C. 20460

October 24, 19

Dear Administrator Reilly,

I am appalled to learn that the Ethyl Corporation is attempting to introduce a gasoline additive called "Hi Tee 3000". This product contains large amounts of the metal manganese which produces symptoms of Parkinson's disease in humans. If we add manganese to gas today, we will assuredly face the same environmental and health problems in the future that face today from lead. I strongly urge you to deny Ethyl Corp's application for "Hi Tee 3000."

Sincerely,  
Ruth J. Sorri

10/23/90

Wm. K. Reilly  
EPA

401 M Street, SW  
Washington, DC 20460

RE: Ethyl Corp. Hi-Tec 3000 additive

Please do not permit Ethyl Corp. to  
~~push another toxic heavy metal additive~~  
in gasoline. There is no reason  
to open our fragile environment  
to a new health hazard. Let's be  
responsible and act accordingly before  
we regret it later. Don't allow Ethyl  
Corp. to fool us into believing it is  
safe.

I'm counting on the EPA to  
deny Ethyl's request!!!

Sincerely,

Mrs Teri L Carpenter  
915 Ridgecrest Dr SE  
Albuquerque NM  
87108-3370



L. Teri Carpenter

Mar 26, 1981

Dear Administrator Leilly,

As an environmentalist  
and an active member of the  
Environmental Defense Fund I  
urge you to deny the  
application of the Ethyl Corp.  
for the gasoline additive  
Hi-Tec 3000. We know  
by now that this additive  
has a manganese base and  
therefore will further  
poison our environment.

RECEIVED  
EPA  
CORR. CONTROL

900CT 30 A 2:22

ZhC1Q

Cocca, MA  
1172 Lower Rd.  
Route 10. Somers  
Thank you,

10-19-90

Mr. Wm K. Peilly  
401 - M Street, S.W.  
Wash. D.C. 20460

Dear sir -

We have been much concerned over the lack of attention by this and the previous administration to alternate fuels and/or additives.

I am well acquainted with several of the employes of the Orangeburg Ethyl Co. — and know of their

dedication and work  
towards better fuel,  
more efficient fuel -  
"Hi Tech 3000" performance  
additive appears to be  
a giant step toward  
better fuel efficiency.

Our country is in need  
of some clear heads - some  
care for the environment  
Please support and encourage  
this additive to boost the  
octane rating of gasoline -  
and to extend fuel efficiency.  
The Canadians are ahead!!  
Sincerely - Lois Lusty (Mrs. Arthur J. Lusty)

PAUL MOSS  
4015 PILLSBURY AVENUE  
MINNEAPOLIS, MN 55409

10/21/90

Dear Mr. Reilly,

I am writing to urge you not to approve Ethyl Corporation's application to use "Hi-Tec 3000" in gasoline.

This additive, MMT, will release large amounts of manganese into the environment if it comes into common use. Manganese is a toxic heavy metal which can produce Parkinson-like symptoms at high doses —

Just like lead in gasoline, manganese

can prove to have real risks to the  
public - and we will have no choice  
about being exposed in the air we  
breathe, soil of our gardens, etc.

Please reject Ethyl's application  
to use MMT.

Thank you -

Paul Rose

MRS. BENNITT E. BATES  
76 INDIAN HILL ROAD  
WINNETKA, ILL. 60093

10-23-90

Dear Mr. Reilly:

I entreat you to disallow  
"Hi-Tec 3000" and help all  
of us stay healthier, an  
increasingly difficult task.

The ones who suffer the  
most are the children of  
poverty already dreadfully  
disadvantaged.

The educational system  
in Chicago is bad enough,  
but the possible risk of  
injuring the brains of

the children added to  
that makes the future  
seem hopeless!

I hope you will help  
stop "Hi-Tec 3000".

Sincerely,

Mary Burdette  
(Mrs B.E.)

P.29  
October 22, 1990

Dear Mr. Reilly:

It's shocking to think that the Ethyl Corporation might be allowed to sell a gasoline additive ("Hi-Tec 3000") which will contaminate America with a toxic heavy metal - manganese. Think of what Ethyl's lead in gasoline has cost us, both in human health & in sheer dollars for clean-up. Is someone being bribed, that there is even a possibility of Ethyl being allowed to contaminate again, with a new toxic metal?

(over ?)

I trust you will not allow  
this to happen!

Thank you for your attention.

Sincerely,

Olivia Eibson

52 Sarone Court  
Oakland, CA 94611

900126 P2.16

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EPA  
CORR. CONTROL

440 East 57 Street  
Apt 11C -  
New York, NY 10022  
Oct. 23, 1990

William T. Reilly  
Administrator USEPA  
401 M Street S.W.  
Washington, D.C. 20460

Dear Sir:

I strongly urge you to deny  
Ethyl Company application for "A, Tec 3000"  
a Toxic manganese based gasoline  
additive.

It is outrageous that this  
company continues to try to degrade  
the environment and to do so with  
proven, toxic fuels and additives -  
Please advise your decision.

Sincerely,  
Mrs. Catherine Bachenheimer

3921 E. 37 Pl.  
Tulsa, OK 74135  
October 21, 1990

William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Mr. Reilly:

I urge you not to approve  
Ethyl Corporation's HiTec 3000.  
We cannot afford to poison  
our environment further.  
The past must be learned from,  
or we are DOOMED.

Sincerely,  
Gloria Dialectic

WILLIAM K. REILLY  
Administrator  
Environmental Protection Agency  
401 N Street S. W.  
Washington, D. C., 20460

Dear Sir:

The Ethyl Corporation of America is asking you to approve a gasoline additive called "Hi-Tec 3000". This substance contains manganese, a TOXIC HEAVY METAL known to produce symptoms of PARKINSON'S DISEASE at high doses; adding it to gasoline will release large amounts of manganese into the environment. You realize the addition of LEAD to gasoline has produced similar problems and is known to cause terrible problems to humans.

This may be profitable to the Ethyl Corporation but it will be very costly to us everyday people who are exposed to it. There is a virtual lead poisoning epidemic among this nation's children from all levels of life right now and much of it comes from cars that burned leaded gas for the past 65 years. Cleaning up this contamination will be both slow and expensive. How much money will the gasoline companies be paying toward it?????

We do NOT want another poisonous additive in gasoline. There is NO reason to expose the environment to another hazard (aside from the profit motive for a private business...). Shame on them for this outrageous proposal! and shame on you if you allow it.

Sincerely, from a fellow earthling



ALMA HERRERA  
6154 SAWHILL ROAD  
PARADISE, CALIFORNIA 95969

10/23/90

Mr. Reilly -

In regards to the Ethyl Corporation - hope fully the EPA will not approve Hi-Tec 3000. We should be looking the other directions - Rather than putting more toxins in our environment -

Sincerely,  
Anne Kretz  
Member EDF

Oct 21, 1990

Dr. Mr. Reilly -

I urge you to not approve the use of Hitec 3000 for a gasoline additive product. Heavy metal pollution of the environment is a under-recognized and under acknowledged health hazard. Don't be known as the person to allow a new poisoning of our population and environment.

Always concerned  
Bruce Stock &  
Member EDF.

William K. Reilly  
Environmental Protection Agency  
401 M. Street SW.  
Washington, D.C. 20460

Dear Administrator Reilly,

As an environmentalist and mother of a beautiful bright eye to 1 yr. old boy, I urge you to please deny Ethyl Corporation's application for "Hi Tec 3000." Of this decision lies on your shoulders, please take our children's health into consideration here. They deserve a wonderful, healthy, clean life! Please, protect them from these money hungry corporations! To allow this toxic chemical to come into the air we breathe would be a travesty!

Thank you,

Pam Simmons  
516 Wilder Place  
Shreveport, LA 71104

Mary Thornton Smith  
192 East 75th Street  
New York, New York 10021

October 24, 1990

Dear Mr. Reilly,

I am writing to ask you to please not approve the use of the gasoline additive HiTec 3000 which the Ethyl Corporation is planning to put on the market. Since the long-term effects of this product on the environment and on our health are not yet known, I beg you to reject the application of the Ethyl Corporation of America.

Very truly yours,

*Mary Thornton Smith*

Oct 23, 1990

Mr. William K. Reilly  
U.S. EPA Administrator  
Washington D.C. 20460

Mr. Reilly,

Please reject Ethyl Corporation's "Hi Tec 3000" proposal, which would release significant amounts of manganese into the environment. Lead poisoning was Ethyl Corp's last contribution. Do we need another pollutant in the air?

Please consider the far-reaching consequences.

Thank you,

J. A. Gordon

550 Tullis Bkwy #208  
Cleveland, Ohio  
44147

435 19<sup>th</sup> Avenue  
San Francisco, CA  
941  
October 31, 1990

William R. Kelly  
EPA Administration  
Washington DC  
20460

Re Ethyl Corporation's application  
to use NMT

I was appalled to learn that the Ethyl Corporation is trying to get EPA approval for a new gasoline additive containing manganese. I couldn't believe it when it was pointed out that the arguments in favor of NMT were almost the same ones used when lead was first introduced as an additive.

Please reject this new application and suspend all currently permitted use of manganese as a gasoline additive. The health of our children is at stake.

Sincerely,

Muri Fried-Lee

PHIL & LOU EMMONS  
7805 TRYON GROVE RD.  
RICHMOND, IL 60071

11/9/90

Dear Mr. Bailey,

I am writing for my husband  
and myself to ask that you  
reject Ethyl's application to  
use MMT in its gasoline.

The long term dangers of this  
additive have not been adequately  
assessed. God forbid we  
should repeat another fiasco  
like the lead gasoline we  
had finally gotten rid of and  
the problems it created.

Thank you for your support  
in defeating this measure.

RECEIVED  
11/9/90  
b6 b7c  
Lou & Phil Emmons

Oct 19, 1970

Administrator Wm. R. Reilly  
EPA

401 TN St., SW,  
Washington D.C. 20460

Dear Sir:

We are very concerned about our environment & the toxic substances which are affecting our planet. Already, our air, water & climate are affected by pollutants.

We strongly urge you to deny Ethyl Corporation's application for "Hi TEE 3.000", a highly toxic gasoline additive - we don't need more toxins in our environment!

Sincerely,  
Fay & Leo Kessler

LEO J. & FAY J. KESSLER  
1240 HARVARD STREET, APT. 3  
SANTA MONICA, CA 90404

6 Nov 90

Mr. Reilly

I understand that Ethyl Corporation is applying to market a gasoline additive with methylcyclopentadienyl manganese tricarbonyl (MMT) in it.

I urge you to reject their application and suspend any permission currently granted for manganese as a gasoline additive in the United States.

Permission to market MMT would be a giant step backwards in our effort to clean up our air.

Sincerely yours,

James S. Barber  
P.O. Box 60121  
San Diego, CA  
92166

Molly J. Sager  
12335/5th Avenue  
LA, CA 90025

William K. Reilly  
EPA Administrator  
Washington, DC  
20460



Dear Mr. Reilly,

Please reject the Ethyl Corporation's application to use "octane-enhancing gasoline additive" methylcyclopentadienyl manganese tricarbonyl (MMT).

The toxic effects of manganese are not all known to approve this known neurotoxin. I urge you to reject its usage, and to suspend all currently permitted use of manganese as a gasoline additive.

Sincerely,  
Molly J. Sager

recycled paper

Harriet Pace  
4000 Towerside Terrace  
Miami, Florida 33138  
(305) 922-8189

Dear Mr. Kerly, 11-4-40

Please do not allow  
Ethyl or any other company  
to use M.M.T. Hearst knows  
we have done enough harm  
without allowing this.

Sincerely,  
Harriet Pace

11-15 5:15:20

Mrs. L. C. Clayton  
914 Lakeview  
Warrenton, Missouri 63383

Nov. 9, 1990

EPA Administrator Wm. T. Reilly  
Washington, D. C. 20460

Dear Mr. Reilly,

Would you please reject the Ethyl Corporation's application to add methylcyclopentadienyl manganese tricarbonyl to gasoline and suspend all currently permitted use of this substance as a gasoline additive in the United States? Its safety has not been proved.

Sincerely yours,

Willie Mae Clayton

JOHN F. COYNE  
5503 17<sup>TH</sup> AV NW #510  
SEATTLE WA. 98107

WILLIAM K REILLY

DEAR SIR:

AS A MEMBER OF AT LEAST  
(15) FIFTEEN DIFFERENT  
ENVIRONMENTAL GROUPS I STRONGLY  
URGE YOU TO REJECT ETHYL CORP.  
APPLICATION TO USE M.M.T.  
AS A GAS ADDITIVE AND IMMEDIATELY  
SUSPEND CURRENTLY PERMITTED  
USE OF MANGANESE AS A GAS  
ADDITIVE.

BOTH WHAT WE DO KNOW  
AND WHAT WE DO NOT KNOW  
ABOUT THE TOXIC ENVIRONMENTAL  
EFFECTS OF MANGANESE  
SHOULD BE YOUR (OUR) GUIDE.

SINCERLY  
*John F. Coyne* JOHN F. COYNE

2308 Cottage Lane Rd.  
Silver City, NM 88061  
November 2, 1990

William R. Rilly  
Environmental Protection Agency  
401 M. Street S.W.  
Washington, DC 20460

Dear Administrator Rilly:

Thank you for all you are doing to limit toxic changes to our environment. I hope your attention has been turned to Ethyl Corporation's "HiTeo 3000" proposal, which would allow a manganese-based gasoline additive. We know manganese is toxic. Please do not let us find out that the hard way that manganese extruded into our environment in this way (exhaust) produces toxic symptoms.

HiTeo 3000 is supposed to help control emission volumes. It seems likely that

improving standards for vehicle gas mileage  
would be more effective without experiments  
with our environment.

Thank you for your attention.

Respectfully yours,  
Jennifer S. Hammond

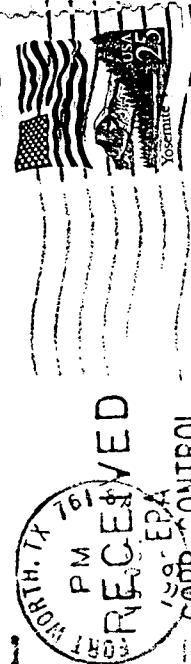
NOV 13 P 3 : 16  
40045  
CORR CONTROL  
EPA  
RECEIVED

11-16-90

Dear Mr. Reilly,

Please reject Ethyl's application  
for use of manganese-based compound  
as gasoline additive and suspend all  
currently permitted use of manganese  
as gasoline additive in U.S.

Alice Lachance  
110<sup>th</sup> Legislative District  
Voter



**Denali (Mt. McKinley) National Park, Alaska.**

Photo © Carr Clifton  
2407 Emerald Circle, South Lake Tx. 76092  
The Sierra Club Legal Defense Fund has halted all placer mining in  
44 million acres of Alaska's national parks, including Denali, until the  
National Park Service regulates the mining to prevent pollution of the  
park's rivers and streams. Your support of the Legal Defense Fund will  
help our clients all over the country protect our parks and forests, the air  
we breathe, the water we drink, the wildlife and wilderness we cherish.

Mr. Reilly,

Please do NOT approve of the gasoline  
additive called "Hi-Tec 3000" that Ethyl  
Corporation wants to begin using. I understand  
that it contains manganese which is known to  
produce symptoms of Parkinson's disease at high  
doses. I am mighty tired of large corporations  
pulling the wool over the eyes of the public, pretending  
+ lying that their products are safe when in fact  
it is known they are not. The green movement has  
arrived in this country - I only hope there will be  
something left of our planet for the next generation.  
Please hear my plea - Thank you - Lucy McElroy

37183  
900CI 23 AM: 05

To:

William K. Reilly  
Environmental Protection Agency  
401 M. Street, SW  
Washington, D.C. 20460

Administrator William K. Reilly,  
Environmental Protection Agency  
Washington, D.C.

Oct 18/90

Dear Mr. Reilly

I am very concerned  
about the environment and am  
against the idea of Ethyl Corp.  
even thinking about the use  
of "Hi-Tec 3000", a toxic gasoline  
additive. Please don't allow  
this to happen!

Sincerely

Jeannine Palms

Mrs. Jeannine C. Palms  
788 E. Square Lk. Rd.  
Bloomfield Hills, MI 48304

Nov 6, 1990

Dear Mr. Really

I'm writing to you to express my support of the additive by Ethyl Corp., H-Tec 3000, which your agency is testing and do hope you give approval very soon. I see nothing but good from this additive and hope you will give Ethyl Corp. and the many other people who do this kind of work a chance to develop things like this additive; instead of costly add ons like scrubbers etc. etc. I know they will come through.

Yours for a cleaner environment

Sincerely

Jay H. Officer

3440 S. JEFFERSON ST. APT. 823  
FALLS CHURCH, VA 22041-3127

Oct. 18, 1990  
EPA Administrator William K. Reilly  
Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec" 3000, a toxic Manganese-based gasoline additive.

Sincerely.



Henry L. Mason

M. JASTROW LEVIN  
3712 CHESHOLM ROAD  
BALTIMORE, MARYLAND 21216

Oct 19, 1990

Mr. William K. Reilly  
Administrator  
Environmental Protection Agency  
401 M. Street, S.W.  
Washington, D.C. 20460

Dear Mr. Reilly:

Three of my friends suffer from Parkinson's disease. It is terrible! Please try not to increase the number of people so suffering by refusing the Ethyl Corporation of America from using "Hi-Tec 3000" in gasoline.

Sincerely yours,

M. Jastrow Levin

## ROBINSON CUSHMAN

October 19, 1990

Mr. William K. Reilly - Administrator  
Environmental Protection Agency  
401 M Street, SW  
Washington DC 20460

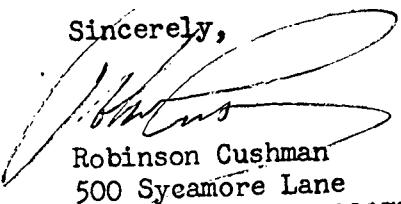
Dear Mr. Reilly :

I understand that the Ethyl Corporation is looking for your permission to introduce HiTec 3000, which contains manganese, as a gasoline additive.

I sincerely trust that the EPA will reject this application which could create a health hazard similar to the lead poisoning now affecting countless individuals throughout the world.

Please do not let the Ethyl Corporation and its large scale advertising program influence you - we cannot afford another toxic heavy metal additive in gasoline. Please reject this application.

Sincerely,



Robinson Cushman  
500 Sycamore Lane  
Wakefield, RI 02879

DEA #

GAROLD L. FABER, M.D. MPH

SUITE 209

2850 ARTESIA BLVD.

REDONDO BEACH, CA 90278-3470

370-1731

CA LIC. NO. A14919

NAME Dear Mr. Reilly

ADDRESS \_\_\_\_\_

DATE 10-19-90

R re: Ethyl Corp request  
to use manganese in gas.

This is also a  
heavy metal which  
 is toxic! Please

Refill \_\_\_\_\_ times PRN NR  
 reject:

DO NOT SUBSTITUTE  
To insure brand name dispensing,  
check and initial box.

10/26/89

00702510121

G Faber, M.D.

SIR — OUR FAMILY, PRESENT  
& FUTURE, URGES YOU TO REJECT  
ETHYL'S APPLICATION TO USE  
MMT (METHYLCYCLOPENTADIENYL MANGANESE  
TRICARBONYL). JUST SAY "NO" NOW!

OUR FAMILY & THE WORLD THANKS YOU.

EARTHDAY EVERYDAY  
-----  
RECYCLE  
-----  
GOD BLESS YOU

PHILLIP GRAZIDE  
2829 SENECA LANE  
SANTA ROSA, CA 95403

# GAYE LeBARON'S NOTEBOOK

95462

PM

24 NOV

11-24-90

2837

**LAST WORD:** Phillip Grazide, who lives on Seneca Lane in northwest Santa Rosa, asked his neighbors to give him their recyclable cans and bottles so he can convert them to money for Special Olympics and other charities. Generally, they ignored his requests. Until Grazide got mad enough to deliver a giant message.

He had a red, white and blue banner made, 4 feet by 8 feet, at a cost of more than \$200. He planted two posts firmly in his front yard and stretched the banner between them. The message: "If you don't recycle and if you don't care and if you don't give and if you don't vote, then why did God put you here? Either lead, follow or get out of the damn way." He says it's helped "some," but not much. And, so far as he can see, "It'll be there forever."

"If I had me the money, I'd buy me a billboard along the road."

merica the Beautiful USA 15

JONAH

CORP

EPAD

COADM

R

WILLIAM K. REILLY

Administrator

WASHINGTON D.C.

4152

20460

**NEW ENGLAND Series**

NE 4013

*The Rugged Beauty of New Hampshire's National Forests*  
Photo © Steven Krouse

10/22/90

Dear Dr. Reilly,  
Please do not allow William K. Reilly  
Ethyl Corp. to add EPA 401 M St. SW  
"HiTec<sup>®</sup> 3000" to gasoline. Washington D.C.  
Sincerely, 20460  
*Jacqueline Krouse*  
Jacqui  
Jacqueline Krouse  
191 Woburn St.  
Medford, MA 02165.

**EXPOSURES**

© C.P.S. Inc. Published by © The Acadia School of Photography Box 157, Southwest Harbor, Maine 04679

November 21, 1990

Dear Mr. Reilly:

I urge you to reject Ethyl Corporation's application to use MMT as an octane-enhancing gasoline additive.

This poses too grave a threat to the atmosphere, the environment, and human health. We need to know much more about manganese toxicity before thousands of tons of it are released into the atmosphere.

We've poisoned our planet too much already.  
Please let's not risk a deathly addition.

*Monica Casner*

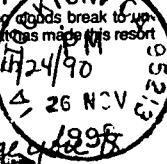
Jean McGurk 40 W. Maple Street CA 95204

MT. REBA AT BEAR VALLEY - morning clouds break to reveal a fresh layer of the powder snow that has made this resort California's favorite.

Dear Mr Reilly,  
I am writing to urge you to reject Ethyle's application to use MMT. I feel the consequences on our environment are life threatening. Thank You.  
Best Wishes

Jean McGurk

 dimacolor  
GRAPHICS INC.  
MIAMI, FLORIDA



JIM DEIS PHOTOGRAPHY, Box 5127, Bear Valley, CA 95223



P9171

Post Card  
William K Reilly  
EPA Administrator  
Washington D.C.

10020460

JOHN S. FULCHER  
RD 2 BOX 201  
AVELLA, PA. 15312

Oct 18 1990

Mr. William K. Reilly  
Administrator EPA  
401 M street SW  
Washington, DC 20460

Dear Mr. Reilly,

I have just learned of an application by the Ethyl Corporation to your Agency for permission to use a gasoline additive called "Hi-Tec 3000."

I'm assured that there is serious concern about the long-term effects on human health of the chronic exposure that its use would have, and I fear a repetition of our experience with additives containing

(over plane)

lead.

Let's not give the Ethyl Corporation permission, once again, to use the entire U.S. population as test subjects in this highly questionable though undoubtedly profitable venture.

Please help restore confidence in the Environmental Protection Agency by guarding us from being victimized once more by unscrupulous profiteers.

Sincerely yours,  
John Rethke

OCT. 28, 1990

ROBERT WINZE

3408 HAMPSHIRE DR.  
ARLINGTON, TX, 76013

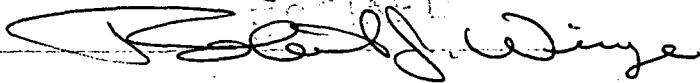
DEAR ADMINISTRATOR REILLY,

AS A CITIZEN CONCERNED ABOUT  
THE CONTINUING POLLUTION PROBLEMS  
IN OUR COUNTRY, I AM COMPELLED  
TO WRITE THIS SHORT BUT IMPORTANT  
LETTER.

PLEASE DENY ETTYL CORPORATION'S  
APPLICATION FOR "HITER 3000".

DO NOT ALLOW ANOTHER GASOLINE  
ADDITIVE TO BE UNIFORMLY  
DISTRIBUTED. THE ADDITION OF  
MANGANESE TO GASOLINE WILL  
MARK THE BEGINNING OF ANOTHER  
LEAD-TYPE CYCLE.

SINCERELY,

Robert J. Winze

105 Greenway West  
New Hyde Park, N.Y. 11040  
Oct. 29, 1990

C.P.A. Administrator,  
William K. Reilly  
Washington, D.C. 20460

Dear Sir:

In the interest of saving  
the environment I urge you to  
reject Ethyl's application to  
use M.M.T.

Thank you.

yours truly,

Mrs. H. Peterman

ZONIA S 51:25

COUS. COMM. CL.  
EPA  
RECEIVED

P.O. Box 5  
Red Hill, PA 18076

**Runaway Farm**  
VETERINARY  
HOSPITAL

(215) 679-6219

D. DIEHL, V.M.D.

Administrator William K. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

21. OCT 1990

Dear Administrator Reilly,

I am writing this letter to strongly urge you to deny Ethyl Corporation's application for 'Hi-Tec 3000', a toxic manganese based gasoline additive.

The slow poisoning of our environment, our children and ultimately the entire human race is too often considered unimportant in the face of economic gain. As a public official it is your moral responsibility to ensure that my children breathe clean air.

Sincerely

Davis Diehl, V.M.D.



October 30, 1990  
1404 Grant St.  
Alcoa, TN 37701

Dear Mr. Reilly,

We are writing to urge you to reject Ethyl Corporation's application to use MMT. As you may know, Ethyl's proposal gave no data on the potential cumulative health effects of this toxic metal. We will end up with another poisoning problem like we have with lead.

We understand that you have the power to stop this before it starts. Please reject Ethyl's application.

Thank you.  
Sincerely,

EEWNS S 55: P3  
Dee Ann Ostby  
*Dee Ann Ostby*

COVIA CHEMICAL

RECEIVED

Schokan N.Y.  
Oct. 30, 1990

Dear Ms. Reilly,

This is to request that the EPA disapprove any additive, manganese to gasoline - no matter what amount. The first fat red, another topic additive, lead, after disastrous effects. Your agency should protect us from becoming human guinea pigs again, subject to unknowns and untold harmful results.

Thank you very much.

Truly yours,

(Mrs) Mary J. O'Donnell

Cd-

VECTRAED

Schokan  
N.Y. 12157

Oct. 30, 1971

Dear Mr. Reilly,

(43)

We are members of "Environmental Defense Fund." In their latest news letter it was mentioned that the Ethyl Corp. is proposing to add manganese to our gasoline (M.M.T) Lead was added to gasoline many years ago and we all know the problems that have arisen because of that.

We urge that EPA reject Ethyl's application and suspend all current uses of manganese as a gasoline additive. We feel strongly that we must all do what we can to protect our children and grandchildren from the poisonous effects of chemical additives.

Sincerely,

H.C. and D.E. Hettmansperger

3119 Eubank St. #116

Albuquerque, N.M. 87111

29 Oct 90

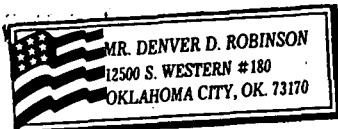
Mr Reilly

Please do not allow the  
use of MMT (Ethyl's  
application) as a gasoline  
additive.

Thanks

Denver D. Robinson

DENVER D. ROBINSON, Lt Colonel, USAF  
Deputy Director, Combat Support



Oct. 29, 1990

Dear Mr. Reilly,

We urge you to turn down Ethyl Corporation's application to add a manganese compound (MMT) to gasoline. Widespread use of this compound would constitute a needless public health hazard. Far greater gains in air cleanliness will result from raising miles-per-gallon averages for vehicles and an array of other measures. Why take a needless chance for little or no gain?

Sincerely,  
Audy & Vicki Gould

October 29, 1990

Hannah Litzky  
43 Edgewood Avenue  
West Orange, New Jersey 07052

William K. Reilly  
Administrator, Environmental Protection  
Agency  
Washington DC 20460

Dear Mr. Reilly:

We do not want any more chemicals polluting our air!

We strongly urge you to reject the application from the Edyl Corporation to add MMT (manganese, a heavy metal) to gasoline. Our population is still suffering from the lead they gave us years ago.

Please make every possible effort to reduce air pollution.

Very truly yours,  
Hannah & Leo Litzky

Oct. 31, 1990

Dear Mr. Reilly,

Please do not let Ethyl Corporation add MMT (methylcyclopentadienyl manganese tricarbonyl) to gasoline.

We cannot risk the effects that manganese exposure is likely to have on human health and the environment.

Instead, please encourage the petroleum and automobile industries to develop cleaner fuels and more efficient automobiles.

Thank you.

Sincerely,

Carol Botteron

36 Porter St.

Somerville, MA 02144

CCWMA 2

CCBIS 1

E

October 28, 1993

Administrator Wm.K. Rilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Dear Administrator Rilly -

As a citizen who is very concerned about our environment and a member of the Environmental Defense Fund, I wish to strongly urge you to deny Ethyl Corporation's application for "Hi Tech 3000", a toxic manganese-based gasoline additive.

Sincerely,

RONON 2 See Beckley  
P.O. Box 1653  
Edmond, OK 73083

CDR6 ENR  
RECEIVED

10/29/90

Dear Mr. Reilly,

a short, but urgent note to let you know we are very much against the new product from Ethyl Corp. - Hitec 3000, and hope you will not approve its use.

another toxic heavy metal additive to further stress our "un-clean" air & overloaded environment is the last new item we as a people need!

Sincerely

Dr. & Mrs Richard Sanders  
2209 Sunset  
Norfolk, NE 68701

10/29/90



William K. Reilly  
EPA Administrator  
Washington DC 20460

10/27/90

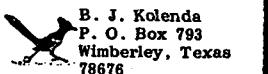
Re: October 1990 issue of Environmental Defense Fund Newsletter Vol. XXII #4  
Ethyl Corporation's application to  
use methylcyclopenta dienyl  
manganese tricarbonyl (MMT)  
as a gasoline additive  
This report states that even though data on manganese are sparse compared to that accumulated on lead, we do know enough to state that manganese is a human neurotoxin with irreversible pathological effects on brain structure. As we do not know

what is a safe level of manganese exposure, it is intelligent to assume that wide dispersion of manganese in our environment, as has been true with lead, will lead to disastrous effects to future generations.

You are being paid a large salary to protect the interests of the American taxpayers & their children.

Please reject this application of the Ethyl Corporation & immediately suspend all currently permitted use of manganese as a gasoline additive in any area over which you have jurisdiction.

Sincerely,  
Mr. B.J. Kolenda



247-16 Union Turnpike  
Bellerose, N.Y.  
1/14/26  
10/30/90

Administrator:  
William R. Reilly  
Environmental Protection Agency  
401 M Street, SW  
Washington, D.C. - 20460

Dear Sir:

I am writing to protest the use  
of leaded gasoline - and to protest  
the addition of "Hi-Tec 3000" (Ethyl Corp.)  
to gasoline which will release large  
amounts of manganese into the  
environment having deleterious  
effects on human health.

How about cleaning up the mess  
we have now without adding to it?

And while you are at it - how about  
the noxious fumes from buses and  
exhaust from old tail pipes that  
should be removed from the road.

Also - trucks with pipe-like  
chimneys leaving a trail of black  
soot and smoke as they travel along.

Why so long for something  
to be done?

People are choking to death -  
millions are suffering and I  
am one of them begging for  
relief!

Most sincerely -  
Florence W. Laverdelle

P.S. Within the last few years  
I am suffering from asthma -  
I have never smoked nor  
has anyone in my home.

53 Brushy Plain Road  
Bronfman CT 06405  
October 30, 1990

William K Reilly  
EPA Administrator  
401 M St. SW ~~20460~~  
Washington, D.C. 20460

Dear Mr. Reilly,

This letter is to urge that EPA reject the Ethyl Corporation's application to use ~~methyl~~ methylcyclopenta dienyl manganese tricarbonyl - MMT as a gasoline additive.

I understand that, despite Ethyl's promotion of this additive as reducing tailpipe emissions on cars, the reduction would actually be slight. The toxic effects of manganese on public health have not received nearly enough study. But by what is known, manganese's <sup>long duration</sup> ~~acute~~ cumulative effects may be quite toxic (added to other pollutants' toxicities) especially

2.

for fetuses, the aged, and children.

I urge you, again, to  
reject this application.

Sincerely,

Anne Lyles

Patricia J. Sinclair  
338 Hillcrest Avenue  
Trenton, New Jersey 08618

October 31, 1990

William K. Reilly, Administrator  
Environmental Protection Agency  
Washington, DC 20460

Dear Sir

Washington, D.C.  
Dear Sir,  
The Ethyl Corporation has an application  
to use manganese as a gasoline additive.  
Not enough studies have been made on  
the effect of manganese on humans. It is  
known, however, that a high dose is  
a neurotoxin. Please do not grant the  
use of manganese in gasoline. It can  
be very dangerous to humans, and the  
environment should not be polluted any  
further.

Leaded gasoline was begun to be used in 1925 by the Ethyl Corporation. We found out that it was harmful to health and it was banned. Is this going to happen all over again with manganese? I support the Environmental Defense Fund to reject the

I support the environmental  
Fund in asking you to reject the  
application to use manganese. I come  
from a highly polluted area here in  
Trenton, and I don't want any further  
risk to my health. Please proceed  
cautiously.

to my  
tions by  
Thank you for your attention.

Sincerely,  
Patricia Sinclair

ANN SWEET  
8 FARM ROAD  
WESTON, MASSACHUSETTS 02193

October 25, 1990

William K. Reilly  
EPA Administration  
Washington, D.C. 20460

Dear Mr. Reilly,

Please do not approve the use  
of MMT as a gasoline additive.  
We fear its long term effects on  
our children's health.

Sincerely,  
Ann Sweet

2 pages

Oct. 29, 1990  
2700 Center St. Apt. B.  
Granite City, IL 62040

M. Wm. F. Reilly  
E.P.A.  
401 M. St. S. W.  
Washington, D. C. 20460

Dear Mr. Reilly:

Ethyl Corporation of America has acted irresponsibly in the past with its lead gasoline additives and is now working very hard to foist yet another heavy metal additive called "Hitec 3000" on the public.

Surely our sad experience with high levels of lead in our environment has made us wise enough not to repeat the problem with the toxic heavy metal, manganese, which is in "Hitec 3000."

You can spare us from this scheme

Sincerely  
Thelma Chapman

## Diplomate American Board of Anesthesiology

DARREN F.X. CLAIR, M.D.

*a medical corporation*709 17TH STREET  
SANTA MONICA, CALIFORNIA 90402

William Reilly  
EPA  
Washington DC 20460

Dear Sir,

I am writing to you to express my deep concern for the health effects produced by the addition of manganese to gasoline as an octane enhancer.

Manganese is a known neurotoxin. Manganese has not been investigated in the appropriate manner to ensure the health of the environment and people.

Please reject any use of manganese until more is known about this potentially catastrophic additive. Let's not repeat the mistake of lead.

Thank you  
Darren Clair

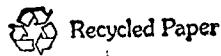
P.O. Box 206  
Old Bethpage, NY 11804  
November 9th, 1990

Dear Administrator Reilly,

As an environmentalist and active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000", a toxic manganese-based gasoline additive.

Sincerely,

May Stevenson  
Member of the E.D.F.



11-12-1990

To: Mr. W. K. Reilly  
EPA Administrator

Sir,

We recently read about the plan of the Ethyl Corporation to use MMT, methyl manganese tricarbonyl, as an additive to gasoline.

It is known that this substance acts as a neurotoxin, affecting selectively the fetus, the young and aged as it accumulates. It may even be carcinogenic.

We urge you to reject the application of Ethyl Corporation and to suspend all currently permitted use of MMT as a gasoline additive.

Sincerely,

Dr. and Mrs. K. L. Schubbe

Dorothy Fue Wong  
5541 Village Green  
Los Angeles, CA 90016

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

*Dorothy Fue Wong*  
Dorothy Fue Wong

Nov. 13, 1990

Mr. & Mrs. Thomas Vollers  
14 Pemberton Ave.  
Oceanport, NJ 07757

William K. Rielly  
E.P.A. Administrator

Dear Sir -

After reading the article written by Dr. Ellen K. Silbergeld in the most recent letter from the Environmental Defense Fund concerning Ethyl's Corporation's desire to use MMT (Hi-Tec 3000) (methylcyclopentadienyl manganese tricarbonyl) as a gasoline additive and also reviewing an extremely polished piece of literature about the product from the Ethyl Corporation itself. I must conclude that the use of this product as cannot be ok'd b.y. the E.P.A. I must urge you and your organization to reject Ethyl's application for the use of MMT. Sincerely yours W. Vollers

822 Cityscape Plaza  
Atlanta, Georgia 30308  
(404) 881-8353

William K. Reilly, Administrator  
Environmental Protection Agency  
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to urge you to reject Ethyl's application to use MMT. I am a graduate student in occupational and environmental health and am well aware of the tremendous dangers of approving the widespread use of compounds that have not been properly and thoroughly tested toxicologically and ecologically. Please do not endanger us unnecessarily. There is still time for research and debate. Thank you.

Sincerely,



Deborah McK. Harris-Abbott

Peggy S. Prigge  
19 Stanley Dr.  
Lincoln, ND 58504

William K. Reilly  
Administrator  
E.P.A.  
Washington, D.C. 2060

November 6, 1990

Dear Mr. Reilly,

I am writing to urge you to reject Ethyl Corporation's application to use MMT as a gasoline additive. Not only is MMT a neurotoxin, but not much is known about it, and what levels are harmful. Much like Ethyl's lead additive fiasco of 1925, which we are paying dearly for now, MMT as a miracle fix, is very debatable. Let us not risk lives for a quick solution; please reject Ethyl's request.

Sincerely,

*Peggy S. Prigge*  
Peggy S. Prigge

Monte Allen  
24 Coleman Rd.  
Arlington, MA 02174

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Monte Allen

William K. Reilly  
EPA Administrator  
Washington, DC 20460

November 12, 1990

Dear Mr. Reilly,

I am a member of Environmental Defense Fund and I am writing over my concern about the use of MMT as a gasoline additive.

Please reject Ethyl's application to use MMT.

The health of the environment AND we, the people, is FRAGILE. We cannot tolerate any more potential threats to our health. There is too much unknown about the effect of manganese as it collects in dust + soil

I believe we should be removing potential and KNOWN threats to health and environment and definately not adding any POTENTIAL long term problems by using MMT.

Our emphasis should be on alternatives to gasoline - and development of public transportation without cars. Gas is NOT CHEAP any more... for all the years of "cheap" oil we must allocate the cost of the WAR in the MIDDLE EAST to the price of oil. OIL IS expensive in DOLLARS and now, potentially hundreds of thousands of US men + women's lives.

Jamie Wilson  
1405 W. Twin Lakes Road  
Rathdrum, ID 83858-8704

Elizabeth W. Russell  
42 Howell St.  
Canandaigua, NY 14424

William Reilly, Administrator  
Environmental Protection Agency  
401 M Street SW  
Washington, D.C. 20460

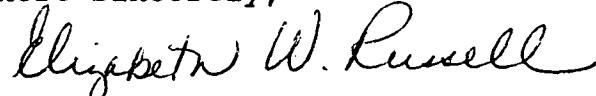
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Elizabeth W. Russell

1851 Gilardy Drive  
Concord, CA 94518  
November 12, 1990

William K. Reilly  
EPA Administrator  
Washington, DC 20460

Dear Mr. Reilly:

I have read with much concern about Ethyl Corporation's application to use MMT.. The jury is still out on the effect this might have on our environment. There is a strong possibility that it could cause as much damage as lead has.

I urge you to reject this application by Ethyl Corporation.

Sincerely,

*Sharon S. Boyle*

Sharon S. Boyle

SSB:s

SPR 10-11-01

6700 Belmont, No. 8  
Houston, Texas 77005

November 5, 1990

William K. Reilly  
Environmental Protection Agency  
Washington, D.C. 20460

Dear Mr. Reilly,

We are writing concerning the application by the Ethyl Corporation for approval from your agency of a new gasoline additive called methycyclopentadienyl manganese tricarbonyl (MMT). The use of another heavy metal additive in gasoline, namely lead, has had many negative consequences, a number of them we are just beginning to control.

At high dose, manganese is a human neurotoxin. We feel very strongly that the health effects and potential toxicity of chronic, low-dose exposure to manganese should be thoroughly understood and carefully documented before the EPA acts on Ethyl's application.

We urge the Environmental Protection Agency to proceed cautiously in its review of MMT.

Sincerely,

*Lawrence D. Stern  
Renee Freedman Stern*

Lawrence D. Stern  
Renee Freedman Stern

Mr. Reilly,

As an EDF member I must urge you  
to reject Ethyl's application to use  
MMT.

Thank You,

James V. Alfieri

3565 FAWN COVE #3

PORTAGE, MI 49002

2000-10 VIII:50

100% COMPLIANT

RECEIVED  
EPA  
CORR. CONTROL

402485  
80NOV16 AM: 20

# A New Idea from the Folks Who Gave Us Leaded Gas

*By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.*

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won



ELLEN K. SILBERGELD

removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

*Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.*

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Conley/Impact Visuals

*With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.*

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

*Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.*

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

**EDF MEMBER ACTION ALERT**  
*Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.*

# EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living

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December on HBO. Produced  
by Consumer Reports Television  
in association with EDF.

## Task Force to Study Fast-Food Trash

*Continued from page 1.*

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

### Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

— *The Wall Street Journal*

"...may break ground in the fight to protect the environment."

— *The Boston Globe*

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste producers and one of its most likely targets, the giant McDonald's fast-food chain."

*The Tribune, Oakland, California*

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**EDF Letter**